

EXHIBIT HH

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ALLAN CHIOCCA,
Plaintiff,

v. C.A. No.: 1:19-CV-10482-WGY

THE TOWN OF ROCKLAND, DEIRDRE
HALL, EDWARD KIMBALL, LARRY
RYAN, MICHAEL MULLEN, JR.,
MICHAEL O'LOUGHLIN, RICHARD
PENNEY AND KARA NYMAN,
Defendants.

DAY THREE
VIDEOTAPED DEPOSITION OF ALLAN CHIOCCA

Tuesday, September 28, 2021
Commencing at 1:05 p.m.

Job #33855

Christine M. Ferraro
Court Reporter and Notary Public

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1 my reputation -- I fully -- back? I fully
2 cooperated.

3 Q. So, Mr. Chiocca, let's see if I can get you to
4 focus on my question.

5 THE WITNESS: I think millions. For
6 what he's done to my life, I think millions,
7 but that's a whole 'nother matter. And --

8 Q. And what's the ba- -- and do you contend that
9 Mr. --

10 A. Are you talking --

11 Q. Let me ask you. I'm asking you anything that
12 you can assign a dollar amount to and why.
13 What damages, with a number, are you claiming
14 from Mr. Kimball and on what basis? Just tell
15 us.

16 A. I think that Mr. Kimball was played in all of
17 this and went along and was concerned about
18 being played and I think he was played. And I
19 think the damages to me have resulted in my
20 being unemployable in this field, the field of
21 my choice.

22 And, going forth, I applied to
23 numerous jobs, I wanted to continue working. I
24 haven't been able to get even as much as an

1 Mr. Ryan.

2 Q. Have you finished your answer?

3 A. I could go on and on but go ahead.

4 Q. I'd just ask you to answer my question, if you
5 can. What do you mean by the words that
6 Mr. Kimball "was played"?

7 A. Mr. Kimball asked if he -- during his
8 interviews and questions with Ms. Ryan, it came
9 out that he apparently asked or said to
10 Ms. Hall, you better not or you shouldn't be
11 playing with me and that I better not be
12 getting played, or words to that effect.

13 And I believe he was. I think that
14 Ms. Hall concocted this story and got her -- or
15 Ed wound up and Ed was on a mission. I don't
16 believe --

17 Q. That's what -- that's what you mean --

18 A. So I think -- I think she was playing him.

19 Q. And so your belief is that Mr. Kimball was
20 played by Ms. Hall; that's what you're telling
21 us?

22 A. Yes.

23 Q. And by that you mean that she fabricated an
24 accusation against you of sexually abusing her

1 that was false and told it to Mr. Kimball; is
2 that what you're saying?

3 A. Between her and her husband, yes.

4 Q. So Mr. Kimball was played by Ms. Hall's husband
5 as well; is that your testimony?

6 A. Yes.

7 Q. When you were working at town hall in Rockland
8 in 2018, did you have a retirement clock on
9 your phone?

10 A. I don't recall that.

11 Q. Do you deny --

12 A. I know I have seen them. I've seen them. I
13 know that one of the employees had 'em. People
14 could punch in the date and have one.

15 Q. Did you have a retirement clock on your phone
16 that you showed other people to tell them that
17 you were retiring as of June 30th, 2019, when
18 your contract ended, yes or no?

19 A. I think at one point I may have. But as you
20 well know, I was looking for an extension over
21 that June 19th...

22 Q. Mr. Chiocca, I'm just asking you a very simple
23 question --

24 A. And I --

1 COMMONWEALTH OF MASSACHUSETTS

2
3 Middlesex, ss
45 I, Christine M. Ferraro, Court Reporter and Notary
6 Public in and for the Commonwealth of Massachusetts, do
7 hereby certify that on Wednesday, October 6, 2021, Allan
8 Chiocca, whose deposition is hereinbefore set forth, was
9 duly sworn by me and that such deposition is a true
10 record of the testimony given by the witness.11 I further certify that I am neither related to or
12 employed by any of the parties in or counsel to this
13 action, nor am I financially interested in this action.14 In witness whereof, I have hereunto set my hand and
15 affixed my seal on this 12th day of October, 2021.16
17 *Christine M. Ferraro*

18 Christine M. Ferraro

19 NOTARY PUBLIC

20 My Commission Expires:

21 January 7, 2022
22
23

24 DEPOSITION ERRATA SHEET